

REMARKS:

Claims 1-30, 32-41, and 43-46 were pending in the application at the time of examination. Claims 1-30, 32-41, and 43-46 stand rejected as obvious. Claims 1-30, 32-41, and 43-46 are presented for examination.

Pending Claims

Applicants wish to bring to the Examiner's attention that the Office Action summary lists the pending claims as 1-30, 33-41 and 43-46. Applicants respectfully point out that the Office Action summary should instead reflect the pending claims as 1-30, 32-41, and 43-46, as Claims 31 and 42 were earlier cancelled.

Rejections under 35 U.S.C. §103(a) over Bickmore

In the final Office Action, the Examiner rejected Claims 1-11, 15-20, 27, 28, 31, 34-36, 39, and 41-46 under 35 U.S.C. §103(a) as being unpatentable over Bickmore et al. ("Web Page Filtering and Re-Authoring for Mobile Users", herein Bickmore) in view of Fielding et al. (RFC 2068, herein Fielding). Applicants respectfully point out that Claims 31 and 42 are not pending.

Claims 1-10

Applicants respectfully traverse the rejections of independent Claim 1 and dependent Claims 2-10.

Applicants' Claim 1 recites in part at least:

selecting a presentation scheme specific to said user device for said data from a plurality of presentation schemes in accordance with said presentation requirements wherein upon application of said presentation scheme to said data, new data presentable on said user device is generated.
(emphasis added)

Bickmore

In the Office Action, at page 3, the Examiner conceded that:

Bickmore does not explicitly show the implementation of selecting a presentation scheme from a plurality of schemes.

However, the Examiner maintained that:

Nonetheless this feature is well known in the art and would have been an obvious addition to the system disclosed by Bickmore as evidenced by the future work section of Bickmore.

The future work section of Bickmore shows selecting a presentation scheme from a plurality of presentation schemes....Given these teachings, a person of ordinary skill in the art would have readily recognized the desirability and advantages of modifying the system of Bickmore so as to select a presentation scheme from a plurality of presentation schemes as taught by the future work section of Bickmore, in order to allow users to "adjust the various heuristics used in the planner to suit their taste." (Bickmore, sect 5.1, p. 1 on page 545).

First, Applicants respectfully maintain that the references to Bickmore relied on by the Examiner at Section 5.1, fail to describe or suggest at least "selecting a presentation scheme specific to said user device for application to said data from a plurality of presentation schemes" as recited in part in Applicants' Claim 1.

As stated by the Examiner in the Office Action at page 3:

Bickmore does not explicitly show the implementation of selecting a presentation scheme from a plurality of presentation schemes.

Second, Applicants strongly traverse the Examiner's statement that the above element "is well known in the art and would have been an obvious addition to the system disclosed by

Bickmore as evidenced by the future work section of Bickmore" (emphasis added).

Applicants strongly maintain that the above recited element of Applicants' Claim 1 was not well known at the time the invention was made and that the Examiner's citation to the future work section of Bickmore at sect 5.1, p. 1 on page 545 does not support the proposition that it was well known at the time the invention was made. Applicants respectfully submit that in making the above statement, the Examiner's conclusion of obviousness is based on improper hindsight reasoning. In accordance with MPEP 2141.01 the:

CONTENT OF THE PRIOR ART IS DETERMINED AT THE TIME THE INVENTION WAS MADE TO AVOID HINDSIGHT.

Applicants respectfully submit that the Examiner is required to examine the content of the prior art at the time the invention was made.

Further, in accordance with MPEP 2141.02:

THE CLAIMED INVENTION AS A WHOLE MUST BE
CONSIDERED

and that the

PRIOR ART MUST BE CONSIDERED IN ITS ENTIRETY,
INCLUDING DISCLOSURES THAT TEACH AWAY FROM THE
CLAIMS.

The Future Work Section of Bickmore at section 5.1, p. 1, on page 545 recites:

5.1 More user control

Users should be able to adjust the various heuristics used in the planner to suit their taste.
For example, they could specify the relative preference of the transformation techniques, or specify that some transforms are not used. At a higher level of abstraction, they could express their preferences within a space of trade-offs, such as more content versus larger representation. In

addition, the reauthoring system could be moved to the client and coupled with the browser so that the user could dynamically apply and undo different transformations until they achieved a result they liked. (emphasis added)

As context, Bickmore at page 540, Section 3.3.3 describes:

Digestor re-authors documents by first parsing them and constructing a parse tree or abstract syntax tree (AST) representation, applying a series of transformations to the tree and then mapping the tree back into a document representation (that may be in a document format that is different from the input format). The complexity lies in which subset of the many possible transformations should be applied. (emphasis added)

Further, Bickmore at page 541, para. 3.3.4 emphasizes:

All transformations still take place by manipulating an HTML parse tree.

With regard to transforms, Bickmore at page 539, section 3.3.2 describes:

In this section, we describe the re-authoring engine that uses heuristics to generate pages customized for the specific device upon which they will be displayed. Individual page transformations are ordered by their desirability. In order to determine which combination of transformations should be applied to a given document Digestor performs a depth-first search of the document transformation space, using many heuristics that describe preconditions for transformations and combinations of transformations. The depth-first search ensures that a 'good enough' version of the document is found by using a combination of the most desirable transformations. Only if the more desirable transformations are not applicable or do not reduce the document enough are the less favored transformations used...As soon as a state is created containing a document version that is good enough, the search is halted and the document is returned to the client for rendering. (emphasis added)

Also, with regard to transformations, Bickmore describes that "Digestor applies only syntactic transformations" (Bickmore, page 538, col. 1) and at pages 538 -539 describes some of the transformations, namely: outlining transforms, first sentence elision transform, indexed segment transform, table transform, image reduction and elision transforms, and image map transform.

Thus, taken in its entirety, Applicants submit these transform techniques as described in Bickmore are different from and fail to describe or suggest a "presentation scheme" as recited in Applicants' Claim 1.

In particular, Applicants' specification at page 15, lines 19-23 describes a presentation scheme as:

the totality of the configuration information needed to extract data from a first format and transform the data into new data for presentation on that user device.

Distinguishably, Applicants submit the transforms of Bickmore are individual techniques that are tried in various combinations as applied to an HTML parse tree to generate different document version states until a good enough version state is obtained. The mere speculation in the future work section of Bickmore that users should be able to specify the relative preference of the transforms or specify that some transforms not be used in the combinations applied to the HTML parse tree does not alter that the transforms are not "presentation schemes" nor a "plurality of presentation schemes" as described in Applicants' specification and recited in part in Applicants' Claim 1.

Thus, Applicants submit the references to Bickmore relied on by the Examiner fail to describe or suggest at least "selecting a presentation scheme specific to said user device for application to said data from a plurality of presentation

schemes in accordance with said presentation requirements" as recited in part in Applicants' Claim 1 (emphasis added).

Fielding

In the final Office Action at page 3, the Examiner states:

Bickmore does not explicitly show the requests include information identifying presentation requirements of the user device.

However, with reference to Fielding, in the Office Action at pages 3 - 4 the Examiner states:

Nonetheless this feature is well known in the art and would have been an obvious implementation of the system disclosed by Bickmore as evidenced by Fielding.

Bickmore discloses a system that makes HTTP requests. In analogous art, Fielding discloses HTTP version 1.1. Fielding shows an accept request-header field that is used to specify certain media types which are acceptable for the response (Fielding, section 14.1, 14.2, 14.4). Given these teachings, a person of ordinary skill in the art would have readily recognized the desirability and advantages of implementing the system of Bickmore so as to include information identifying presentation requirements of the user device along with the request, such as taught by Fielding, in order to specify which media types are acceptable for the response.

Applicants respectfully submit the cited references to Fielding do not cure the previously described deficiencies of Bickmore.

Based on the above remarks, Applicants respectfully maintain that Claim 1, as amended, is not obvious in view of and is patentable over Bickmore.

Claims 2-10 depend from Claim 1 and so distinguish over Bickmore for at least the same reasons as Claim 1.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 1-10.

Claims 11 and 15-20

Applicants respectfully traverse the rejections of independent Claim 11 and dependent Claims 15-20.

Claim 11 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes to convert said data from said source data format to said user data format. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 11 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Claims 15-20 depend from Claim 11 and so distinguish over Bickmore and Bickmore in view of Fielding for at least the same reasons as Claim 11.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 11 and 15-20.

Claims 27, 28 and 34

Applicants respectfully traverse the rejections of independent Claim 27 and dependent Claims 28 and 34.

Claim 27 recites in part at least:

a storage medium having stored thereon a plurality of presentation schemes. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Applicants respectfully submit that Bickmore does not describe or suggest at least "a storage medium having stored thereon a plurality of presentation schemes" as described in part in Applicants' Claim 27. Further, Applicants respectfully submit the cited references to Fielding do not cure the previously described deficiencies of Bickmore.

Thus, Applicants respectfully submit Claim 27 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Claims 28 and 34 depend from Claim 27 and so distinguish over Bickmore and Bickmore in view of Fielding for at least the same reasons as Claim 27.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 27, 28 and 34.

Claim 35

Applicants respectfully traverse the rejection of independent Claim 35.

Claim 35 recites in part at least:

selecting a presentation scheme for said data specific to said user device from a plurality of presentation schemes in accordance with said presentation requirements. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 35 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 35.

Claim 36

Applicants respectfully traverse the rejection of independent Claim 36.

Claim 36 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 36 is not obvious in

view of and is patentable over Bickmore and Bickmore in view of Fielding.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 36.

Claim 39

Applicants respectfully traverse the rejection of Claim 39 that depends from Claim 37.

Claim 37 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes based upon said user MIME type and said source MIME type. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 37 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Claim 39 depends from Claim 37 and so distinguishes over Bickmore and Bickmore in view of Fielding for at least the same reasons as Claim 37.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 39.

Claims 41 and 43-44

Applicants respectfully traverse the rejections of independent Claim 41 and dependent Claims 43 and 44.

Claim 41 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes for said content in accordance with said presentation requirements of said user device. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 41 is not obvious in

view of and is patentable over Bickmore and Bickmore in view of Fielding.

Claims 43 and 44 depend from Claim 41 and so distinguish over Bickmore and Bickmore in view of Fielding for at least the same reasons as Claim 41.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 41, 43, and 44.

Claim 45

Applicants respectfully traverse the rejection of independent Claim 45.

Claim 45 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes in accordance with said presentation requirements for said content. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 45 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 45.

Claim 46

Applicants respectfully traverse the rejection of independent Claim 46.

Claim 46 recites in part at least:

selecting a presentation scheme specific to said user device for said data from a plurality of presentation schemes in accordance with said presentation requirements. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 46 is not obvious in

view of and is patentable over Bickmore and Bickmore in view of Fielding.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 46.

Rejection of Claim 29 under 35 U.S.C. §103(a) over Bickmore in view of Fielding in view of Miller

Claim 29 was rejected as obvious and unpatentable over of Bickmore in view of Fielding in view of Miller.

Applicants respectfully traverse the rejection of Claim 29.

Claim 29 depends from Claim 27 and so distinguishes over Bickmore and Bickmore in view of Fielding for at least the same reasons earlier presented with regard to the rejections of Claims 1 and 27.

Assuming arguendo it is proper to combine Miller with Fielding and Bickmore, the citations to Fielding and Miller do not cure the previously described deficiencies of Bickmore.

Thus, Applicants respectfully submit that Claim 27 is not obvious and is patentable over Bickmore in view of Fielding in view of Miller.

Claim 29 depends from Claim 27 and so distinguishes over Bickmore in view of Fielding in view of Miller for at least the same reasons as Claim 27.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 29.

Rejection of Claim 12 under 35 U.S.C. §103(a) over Bickmore in view of Fielding in view of Deach et al.

Claim 12 was rejected as obvious and unpatentable over of Bickmore in view of Fielding in view of Deach.

Applicants respectfully traverse the rejection of Claim 12.

Claim 12 depends from Claim 11 and so distinguishes over Bickmore and Bickmore in view of Fielding for at least the same reasons earlier presented with regard to the rejections of Claims 1 and 11.

Assuming arguendo it is proper to combine Deach with Fielding and Bickmore, the citations to Fielding and Deach do not cure the previously described deficiencies of Bickmore.

Thus, Applicants respectfully submit that Claim 11, and thus also Claim 12, is not obvious and is patentable over Bickmore in view of Fielding in view of Deach.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 12.

Rejections under 35 U.S.C. §103(a) over Bickmore in view of Fielding in view of Freed et al.

Claims 13, 14, 21, 23-26, 37, 38, and 40 were rejected as obvious and unpatentable over of Bickmore in view of Fielding in view of Freed.

Claims 13 and 14

Applicants respectfully traverse the rejections of Claims 13 and 14.

Claims 13 and 14 depend from Claim 11 and so distinguish over Bickmore and Bickmore in view of Fielding for at least the same reasons earlier presented with regard to the rejections of Claims 1 and 11.

Assuming arguendo it is proper to combine Fielding and Freed with Bickmore, the Examiner's citations to Fielding and Freed do not cure the previously described deficiencies of Bickmore.

Thus, Applicants submit that Claim 11, and thus also Claims 13 and 14, are not obvious and are patentable over Bickmore in view of Fielding in view of Freed.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 13 and 14.

Claims 21 and 23-26

Applicants respectfully traverse the rejections of independent Claim 21 and dependent Claims 23-26.

Claim 21 recites in part at least:

selecting a presentation scheme specific to said user device from a plurality of presentation schemes based upon said user MIME type and said source MIME type. (emphasis added)

For at least the same reasons given above for Claim 1, and incorporated herein by reference, Claim 21 is not obvious in view of and is patentable over Bickmore and Bickmore in view of Fielding.

Assuming arguendo it is proper to combine Fielding and Freed with Bickmore, the Examiner's citations to Fielding and Freed do not cure the previously described deficiencies of Bickmore.

Thus, Applicants submit that Claim 21 is not obvious and is patentable over Bickmore in view of Fielding in view of Freed.

Claims 23-26 depend from Claim 21 and so distinguish over Bickmore and Bickmore in view of Fielding in view of Freed for at least the same reasons as Claim 21.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claims 21 and 23-26.

Claims 37, 38 and 40

Applicants respectfully traverse the rejections of independent Claim 37 and dependent Claims 38 and 40.

Applicants respectfully submit Claim 37 distinguishes over Bickmore and Bickmore in view of Fielding for at least the same

reasons earlier presented with regard to the rejection of Claim 1.

Assuming arguendo it is proper to combine Fielding and Freed with Bickmore, the Examiner's citations to Fielding and Freed do not cure the previously described deficiencies of Bickmore.

Thus, Applicants submit that Claim 37, and Claims 38 and 40, are not obvious and are patentable over Bickmore in view of Fielding in view of Freed.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claims 37, 38 and 40.

Rejection of Claim 22 under 35 U.S.C. §103(a) over Bickmore in view of Fielding in view of Freed and in further view of Deach.

Applicants respectfully traverse the rejection of Claim 22.

Claim 22 depends from Claim 21 and so distinguishes over Bickmore and Bickmore in view of Fielding for at least the same reasons earlier presented with regard to the rejections of Claims 1 and 21.

Assuming arguendo it is proper to combine Fielding and Freed and Deach with Bickmore, the Examiner's citations to Fielding and Freed and Deach do not cure the previously described deficiencies of Bickmore.

Thus, Applicants submit that Claim 21, and thus also Claim 22, are not obvious and are patentable over Bickmore in view of Fielding in view of Freed in view of Deach.

Applicants respectfully request reconsideration and withdrawal of the rejection of Claim 22.

Rejection of Claims 32 and 33 under 35 U.S.C. §103(a) over Bickmore in view of Fielding in view of Jones.

Applicants respectfully traverse the rejections of Claims 32 and 33.

Claims 32 and 33 depend from Claim 27 and so distinguish over Bickmore and Bickmore in view of Fielding for at least the same reasons earlier presented with regard to the rejections of Claims 1 and 27.

Assuming arguendo it is proper to combine Fielding and Jones with Bickmore, the Examiner's citations to Fielding and Jones do not cure the previously described deficiencies of Bickmore.

Thus, Applicants submit that Claim 27, and thus also Claims 32 and 33, are not obvious and are patentable over Bickmore in view of Fielding in view of Jones.

Applicants respectfully request reconsideration and withdrawal of the rejections of Claims 32 and 33.

For the foregoing reasons, Applicants respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicants.

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 6, 2005.


Attorney for Applicants

July 6, 2005
Date of Signature

Respectfully submitted,



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